



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*86 Chambers Street, 3rd floor
New York, NY 10007*

April 6, 2020

BY ECF

Honorable John G. Koeltl
United States District Judge
United States District Court
500 Pearl Street
New York, New York 10007

Application granted.
So ordered.

New York, NY
April 6, 2020

/s/ John G. Koeltl

John G. Koeltl
U.S.D.J.

Re: Francesca Conforti v. Commissioner of Social Security
19 Civ. 2958 (JGK)

Dear Judge Koeltl:

Plaintiff filed motion for attorney's fees under the Equal Access to Justice Act in the above-referenced Social Security case on March 23, 2020, and under the Local Rules the government's response is due April 6, 2020. We write respectfully to request that the date for submission of the government's response be extended to June 5, 2020.

This motion was filed after the undersigned and almost all members of the Civil Division of the U.S. Attorney's Office began working remotely or were placed on administrative leave, and after Governor Cuomo's March 20, 2020 order for non-essential workers to stay home. Materials needed to respond to this motion are not available electronically, and cannot be retrieved without ignoring the stay home order. In addition, the calendar of the undersigned requires the filing of seventeen other previously-scheduled briefs in the eight weeks between now and June 5, 2020.

We have attempted to obtain the consent of plaintiff's counsel to this proposed adjournment. He has not agreed but did not provide any reason for the failure to agree. We note that this office provided plaintiff's counsel with the courtesy of agreeing to a 30-day adjournment of the date for his brief on the merits, and also agreed to remand this case. The

government has not previously requested an adjournment in this case. We appreciate the Court's consideration of this request.

Respectfully,

GEOFFREY S. BERMAN
United States Attorney

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